

**REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS TO MODIFY STAY**

All Cases: Debtor(s) CARMEN J. GONZALEZ Case No. 19-32253 Chapter 13  
All Cases: Name of Moving Creditor SPECIALIZED LOAN SERVICING, LLC, AS SERVICING  
AGENT FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR HARBORVIEW  
MORTGAGE LOAN TRUST 2005-9 MORTGAGE LOAN PASS-THROUGH CERTIFICATES, SERIES  
2005-9, its Successors and/or Assigns Date Case Filed 12/28/18  
Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing 1/9/20 or Date Plan Confirmed \_\_\_\_\_

Chapter 7: No-Asset Report Filed on \_\_\_\_\_  
No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a. ☒ Home 1724 E. 54<sup>TH</sup> St., Chicago, Illinois 60615
  - b. ☐ Car Year, Make and Model \_\_\_\_\_
  - c. ☐ Other \_\_\_\_\_
2. Balance Owed as of Petition Date \$485,516.28 as of 12/22/19  
Total of all other Liens against Collateral \$5,422.97
3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral \$343,000.00 per Schedule A/B
5. Default **Debtor intends to surrender this property to creditor.**
  - Pre-Petition Default
  - a. Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
  - b. Post-Petition Default
    - i. On direct payments to the moving creditor  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
    - ii. On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a. ☒ Lack of Adequate Protection § 362 (d)(1)
    - i. ☐ No insurance
    - ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_
    - iii. ☐ Rapidly depreciating asset \_\_\_\_\_
    - iv. ☒ Other The co-mortgagor, Juana Carmen V. Gonzalez, is deceased and to the extent applicable, Movant request relief from the §1301 co-debtor stay.
  - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
  - c. Other "Cause" § 362 (d)(1)
    - i. ☐ Bad Faith (describe) \_\_\_\_\_
    - ii. ☐ Multiple filings \_\_\_\_\_
    - iii. ☐ Other (describe) \_\_\_\_\_

Date: 12/26/19

/s/ Terri M. Long  
Counsel for Movant